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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (SCC)
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS
OBJECTION SCHEDULED FOR HEARING ON MAY 14, 2014**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for the entities in the above-referenced chapter 11 cases

(collectively, the “Debtors”), filed the following omnibus claims objection (the “Claims Objection”) with the Court for hearing on or before May 14, 2014:

- (a) Four Hundred Sixty-Second Omnibus Objection to Claims (510(b) Claims) [ECF No. 43972]

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Response Deadline”) for the Claim Objection for parties to object or file responses. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection have been (a) filed with the Court on the docket of the above-referenced case in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator or the Debtors (or such responsive pleadings have been withdrawn) by any of the holders of the claims included on Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claims Objection will be granted.

4. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit A, which is unmodified since the filing of the Claims Objection, be entered in accordance with the procedures described

in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: May 13, 2014
New York, New York

/s/James N. Lawlor

James N. Lawlor
Adam M. Bialek

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EXHIBIT A
(Proposed Order – ECF No. 43972)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	:	Chapter 11
In re:	:	
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	
	:	
Debtors.	:	
_____	x	

**ORDER GRANTING THE FOUR HUNDRED
SIXTY-SECOND OMNIBUS OBJECTION TO CLAIMS (510(b) CLAIMS)**

Upon the four hundred sixty-second omnibus objection to claims, dated April 11, 2014 (the “Four Hundred Sixty-Second Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” or the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), section 510(b) of the Bankruptcy Code, Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking to subordinate the Underwriter Claims and the Broker Claims, all as more fully described in the Four Hundred Sixty-Second Omnibus Objection to Claims; and due and proper notice of the Four Hundred Sixty-Second Omnibus Objection to Claims having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Sixty-Second Omnibus Objection to Claims is in the best interests of LBHI, its creditors, and all parties in interest, and that the legal and factual bases set forth in the

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred [Fiftieth] Omnibus Objection to Claims.

Four Hundred Sixty-Second Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred Sixty-Second Omnibus Objection to Claims is granted to the extent provided herein; and it is further ORDERED that the Underwriter Claims listed on Exhibit 1 annexed hereto are subordinated pursuant to section 510(b) of the Bankruptcy Code; and it is further

ORDERED that the Plan Administrator is authorized to (a) classify in LBHI Class 11 each Underwriter Claim, or portion thereof, that is subordinated pursuant to this Order, to the extent such claim, or portion thereof, relates in the judgment of the Plan Administrator to a debt security of LBHI; and (b) classify in LBHI Class 12 each Underwriter Claim, or portion thereof, that is subordinated pursuant to this Order, to the extent such claim, or portion thereof, relates in the judgment of the Plan Administrator to an equity security of LBHI; and it is further

ORDERED that this Order has no res judicata, estoppel, or other affect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Four Hundred Sixty-Second Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2014
New York, New York

SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

OMNIBUS OBJECTION 462: EXHIBIT 1 - 510(b) CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE SUBORDINATED	CATEGORY OF CLAIMS
1 BANK OF AMERICA INVESTMENT SERVICES, INC.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	26974	\$9,062.61 *	\$9,062.61*	Underwriter Claim
2 MERRILL LYNCH PIERCE FENNER & SMITH INCORPORATED	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	26975	\$169,204.86 *	\$169,204.86*	Underwriter Claim
3 MERRILL LYNCH, PIERCE, FENNER & SMITH, INC.,	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/22/2009	26984	\$129,582.00 *	\$129,582.00*	Underwriter Claim
TOTAL					\$307,849.47	\$307,849.47	